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MEMO ENDORSED October 6, 2020

10/7/20

Sentencing Adj to
November 17, 2020
At 2:30 pm.

Colleen Mc Mahon

Hon. Colleen McMahon
Chief United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: United States v. Hua Fen Bi
Docket No.: 20-CR-401

Dear Judge McMahon:

I am counsel to Defendant Hua Fen Bi. Mr. Bi is scheduled for sentencing on October 22, 2020. I am writing to seek a three-week adjournment of Mr. Bi's sentencing hearing.

The reason for this request is that I am still waiting to receive important information and documentation relevant to sentencing. These documents will play an important part in our sentencing submission and are necessary for a fulsome analysis of the relevant 18 U.S.C. §3553(a) factors in Mr. Bi's case. The requested adjournment will give us the necessary time to obtain these important documents and incorporate them into our sentencing submission.

I have spoken with AUSA Emily Deininger, and she has no objection to this request.

If the Court grants this request, I would ask that you provide Probation with a commensurate extension of time within which to file Mr. Bi's final Presentence Investigation Report and Addendum.

I thank Your Honor for your consideration and wish everyone well.

Respectfully submitted,

/s/ Edward V. Sapone
Edward V. Sapone

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cc: AUSA Emily Deininger
AUSA Alexandra Rothman
PO Matthew Omlor